

SAB

DAJ/KOH: USAO 2013R00556

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

2013 AUG 28 P 3:33

UNITED STATES OF AMERICA

v.

ALEXANDER MICHAEL BAILEY,

Defendant

CRIMINAL NO.

(Hobbs Act Violation, 18 U.S.C.  
§ 1951; Carrying and Brandishing a  
Firearm During and in Relation to a  
Crime of Violence, 18 U.S.C. § 924(c);  
Aiding and Abetting, 18 U.S.C. § 2;  
Forfeiture, 18 U.S.C. § 981(a)(1)(C),  
28 U.S.C. § 2461(c))

\*\*\*\*\*

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

On or about July 3, 2013, in the District of Maryland and elsewhere, the defendant,

**ALEXANDER MICHAEL BAILEY,**

did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce and the movement of articles and commodities in such commerce, by robbery, as those terms are defined in 18 U.S.C. § 1951, in that the defendant did unlawfully take and obtain property consisting of United States currency from the persons of and in the presence of employees of U COMM Maryland Inc., d/b/a Cricket Wireless, located in Oxon Hill, Maryland, against those employees' will by means of actual and threatened force, violence, and fear of injury to the employees' person.

18 U.S.C. § 1951

CLERK'S OFFICE  
AT GREENBELT

RWT 13 CR 0450

**COUNT TWO**

The Grand Jury for the District of Maryland further charges that:

On or about July 3, 2013, in the District of Maryland, the defendant,

**ALEXANDER MICHAEL BAILEY,**

did knowingly carry and brandish a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States – to wit, interference with commerce by the robbery in violation of 18 U.S.C. § 1951– as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 924(c)

**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction on Count One of this Indictment.

2. As a result of the offenses set forth in Count One of the Indictment, the defendant,

**ALEXANDER MICHAEL BAILEY,**

shall forfeit to the United States, all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations. The property to be forfeited includes, but is not limited to, the following:

a. Personal and real property, including vehicles and U.S. currency;

b. \$302 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained, directly or indirectly, as a result of such violation; and

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of any defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,



e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property, that is, \$302.

18 U.S.C. § 981(a)(1)(C)  
28 U.S.C. § 2461(c)

Rod J. Rosenstein / RGH  
Rod J. Rosenstein  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

Foreperson UU

8/28/2013  
Date